



SOUTHERN CROP PRODUCTION ASSOCIATION

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Ms. Alex Dunn
US EPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Mail code 7101M
Washington, D.C. 20460

Ms. Dunn,

The Southern Crop Production Association is an independent, voluntary, regional trade association dealing with issues affecting the crop production industry. We represent virtually all crop production product manufacturers, formulators, and distributors operating in sixteen states. We provide a unified regional view from our industry to legislators and regulatory agencies at both federal and state levels concerning laws and regulations affecting our products.

We write to you today to encourage the Environmental Protection Agency to issue new registrations of the dicamba products Xtendimax, Engenia, and FeXapan. These products are vital to growers and producers in the 16 states that we represent. In most, if not all, of these states agriculture is the leading industry providing billions of dollars of economic impact.

Even with 2020 crops in the ground getting ready to be harvested, decisions for the 2021 planting season are already being discussed. During this decision-making process it is vital that producers have all available tools at their disposal. Our request is that these products are registered in a timely manner and that those registrations be for multiple years. Having this multiyear registration would provide clarity and reduce uncertainty to producers moving forward.

While the 9th Circuit Court ruling in June to vacate the current registrations has created a challenge for your agency, we continue to believe in science-based decision making. The 16 states in which we operate have robust education and training programs already in place. These stewardship programs have proven to be effective in reducing drift complaints while effectively controlling targeted weed pests. Many of these states have stayed ahead of the issues and concerns that are happening in other parts of the country. This technology is critical to managing weed pressures in these states and vital to the success of these producers.

We appreciate the Agency's effort to find a sensible solution to this difficult situation. We ask that a favorable decision on the registrations be made in a timely matter as future decisions must be made soon.

Respectfully,

Jeff Cassady
Executive Vice President
Southern Crop Production Association